

RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION

JUL 8 9 55 AM '81

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

For Six Month Period Ending 04 JUN 1981
(Insert date)

Name of Registrant

ARNOLD & PORTER

Registration No.

1750

Business Address of Registrant

1200 New Hampshire Avenue, N.W.
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: N.A.

(1) Residence address

Yes ☐

No ☐

(2) Citizenship

Yes ☐

No ☐

(3) Occupation

Yes ☐

No ☐

(b) If an organization:

(1) Name

Yes ☐

No ☒

(2) Ownership or control

Yes ☐

No ☒

(3) Branch offices

Yes ☐

No ☒

2. Explain fully all changes, if any, indicated in Item 1.

N.A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

N.A.

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☒ Yes No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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See Attachment No. 1

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☒ No ☐

If yes, identify each such person and describe his services.

Mark H. Stumpf, Peter T. Grossi, Jr., Robert J. Jones, Joseph H. Guttentag, and Robert E. Herzstein, who have previously filed Short-Form Registration Statements, have rendered services to foreign principals.

Norton F. Tennille, Jr. and Daniel M. Lewis, who became partners during earlier periods, began to render services to foreign principals during this period.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?
Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or connection	Date terminated
Minda A. Frahm	Associate	1/23/81
Nils Pettersen-Hagh	Foreign Associate	1/30/81
Louise J. Richard	Foreign Associate	4/30/81

The following persons ceased rendering services to foreign principals during this period:

James A. Beat	Partner	12/5/80
J. Bradway Butler	Partner	12/5/80
Stephen L. Hester	Partner	12/5/80

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?
Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
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See Attachment No. 2

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

Ets. Beherman Demoen N.V./S.A.,
Engineering Division

2/27/81

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

See Attachment No. 3

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment No. 4

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 5

¹ The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 6

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

N.A.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 7

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N.A.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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See Attachment No. 8

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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*/ See Attachment No. 9

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

International Telecommunications Satellite Organization

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☒ Public Officials ☐ Newspapers ☐ Libraries
☒ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐

Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☐ N.A.

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐ N.A.

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley E. Landau
Brooksley E. Landau
Partner

William D. Rogers
William D. Rogers
Partner

Subscribed and sworn to before me at Washington, D. C.

this 6th day of July, 19 81

Susan De Wasilewski
(Signature of notary or other officer)
My Commission Expires March 14, 1985

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

ATTACHMENT NO. 1

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CRIMINAL DIVISION

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REGISTRATION UNIT

4. Have any persons become partners, officers, directors or similar officials during this six-month reporting period?

Yes X No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
Bruce M. Chadwick	1503 Wasp Lane McLean, Virginia 22101	U.S.	Partner	1/1/81
Mark H. Stumpf	3941 Livingston St., N.W. Washington, D. C. 20015	U.S.	Partner	1/1/81
Peter T. Grossi, Jr.	1229 Aldebaran Drive McLean, Virginia 22101	U.S.	Partner	1/1/81
Robert J. Jones	2200 Columbia Pike Arlington, Virginia 22204	U.S.	Partner	1/1/81
M. Jane Snyder	2120 S Street, N.W. Washington, D. C. 20008	U.S.	Partner	1/1/81
Joseph H. Guttentag	3901 Harrison St., N.W. Washington, D. C. 20015	U.S.	Partner	1/1/81
Irvin B. Nathan	3308 Idaho Avenue, N.W. Washington, D. C. 20016	U.S.	Partner	3/1/81
Robert E. Herzstein	4962 Quebec Street, N.W. Washington, D. C. 20016	U.S.	Partner	3/24/81

ATTACHMENT NO. 2

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7. During this six-month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

Yes X No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Douglas Dworkin	2808 S. Ives Street Arlington, Va. 22202	Associate	2/2/81
Martin Rose	1735 1/2 Corcoran St., N.W. Washington, D. C. 20009	Associate	1/23/81
John H. Jackson	One Heatheridge Ann Arbor, Michigan 48104	Consultant	1/21/81

In addition, the following persons, hired previously, began to render services relating to foreign principals during this period:

William J. Baer	3537 1/2 Alton Pl., N.W. Washington, D. C. 20008	Associate	10/14/80
Douglas L. Wald	2127 California Street Washington, D. C. 20008	Associate	9/8/80
Hadrian R. Katz	3216 Sixth Road South Falls Church, Va. 22041	Associate	9/21/76
Robert Bruce Sonenthal	230 2nd Street, S.E. Washington, D. C. 20003	Associate	9/15/80
Thomas D. Fuller	1028 29th Street, N.W. Washington, D. C. 20007	Associate	10/8/79
George E. Covucci	6106 Berlee Drive Alexandria, Va. 22312	Associate	11/21/77
Eric Summergrad	3114 Wisconsin Ave., N.W. Washington, D. C. 20016	Associate	9/5/78
Mark L. Perlis	328 6th Street, S.E. Washington, D. C. 20003	Associate	9/18/78

ATTACHMENT NO. 3

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9. Have you acquired any new foreign principal during this six-month reporting period?

Yes X No

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INTERNAL SECURITY
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If yes, furnish following information:

<u>Name and address of foreign principal</u>	<u>Date acquired</u>
Government of Nicaragua Casa de Gobierno Managua, Nicaragua	August 1979 ^{*/}
International Telecommunications Satellite Organization (INTELSAT) 490 L'Enfant Plaza, S.W. Washington, D. C.	March 1977 ^{**/}
The de Havilland Aircraft of Canada, Ltd. Garrett Boulevard Downsview, Canada M3K 145	April 1980 ^{***/}
Kawasaki Heavy Industries, Ltd. 4-1, 2 Chome, Hamamatsu-Cho Minato-Ku, Tokyo, Japan	November 1978 ^{****/}

*/ Prior to January 1981, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act or was covered by a prior registration.

**/ Prior to February 1981, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

***/ Prior to April 1981, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

****/ Prior to April 1981, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act or was covered by a prior registration.

ATTACHMENT NO. 4

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JUL 8 9 55 AM '61
INTERVIEW UNIT
REGISTRATION UNIT

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the six-month reporting period.

Ambassador of the Swiss Confederation
Federation Suisse des Associations de Fabricants
d'Horlogerie
Embassy of the Government of Israel
International Commodities Clearing House, Ltd.
The London Commodity Exchange Company, Ltd.
Union Nacional de Productores de Hortalizas
British American Arts Association (U.K.), Ltd.
Dr. Dirk Alan Maxen-McIntire
Corporation for Economic Development H.I. Ltd.
Dutch Employers Federation
Table Grape Growers Association
Manos del Uruguay
Government of Spain

ATTACHMENT NO. 5

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CRIMINAL DIVISION

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INTERNAL SECURITY
REGISTRATION UNIT

11. During this six-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in items 1 through 10 of this statement?

Yes X No

If yes, identify each such foreign principal and describe in full detail your activities and services:

British American Arts Association (U.K.) Ltd.

One of the Registrant's employees served as a member of the Board of Directors and Executive Committee of the principal, provided general information in response to inquiries on the services and activities of the principal, advised the principal about arts exchange programs and related developments in the United States, assisted the principal with respect to a bank account, and co-edited a future publication.

Corporation for Economic Development H.I. Ltd.

The Registrant rendered advice on U.S. laws, regulations, and policies concerning taxation, securities, and other legal requirements with respect to raising capital in the United States. The Registrant represented the foreign principal in connection with negotiation of a contract relating to housing development activities in the State of Israel. The Registrant also had discussions with private financial institutions and developers with respect to the construction and financing of housing in the State of Israel. The Registrant rendered advice concerning a joint venture in the United States for development of a television program series. The Registrant also rendered advice on U.S. laws, regulations, and policies with respect to an agricultural joint venture with a U.S. corporation and with respect to financing of an irrigation project. On behalf of the foreign principal, the Registrant also submitted comments on proposed regulations under the Internal Revenue Code.

Dutch Employers Federation

The Registrant rendered advice on the status of U.S. legislation concerning state taxing systems.

ATTACHMENT NO. 6

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CRIMINAL DIVISION

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INTERNAL SECURITY
SECTION
REGISTRATION UNIT

12. During this six-month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes X No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

International Telecommunications Satellite Organization (INTELSAT)

On behalf of the foreign principal, the Registrant had discussions concerning amendments to Public Law 90-553 (the International Center Act of 1968) with Scott Cohen, staff member of the Senate Foreign Relations Committee. On behalf of the foreign principal, the Registrant also had written communications concerning amendments to Public Law 90-553 with Senator Charles Percy.

Ambassador of the Swiss Confederation

On behalf of the foreign principal, the Registrant had a discussion concerning imports of ball bearings with Donald DeKieffer, General Counsel, Office of U.S. Trade Representative.

The de Havilland Aircraft of Canada, Ltd.

On behalf of the foreign principal, the Registrant assisted the principal in presenting its aircraft to Col. Gustafson, Col. Clarke and Lt. Col. Sinnott, USMC Aviation Weapons System Branch, and Lt. Col. Jensen, NAVAIR.

Corporation for Economic Development
H.I. Ltd.

On behalf of the foreign principal, the Registrant had discussions concerning financing for a housing program in the State of Israel with Steve Giddings, Housing Staff of A.I.D.; Douglas Bennett, Administrator of A.I.D.; and Peter Kim, A.I.D. Staff.

ATTACHMENT NO. 7

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CRIMINAL DIVISION

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INTERNAL SECURITY
SECTION

14. (a) RECEIPTS - MONIES

During this six-month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
12/19/80	Swiss Embassy	Legal Fees	\$ 6,250.00
12/19/80	Swiss Embassy	Legal Fees	5,000.00
12/19/80	Swiss Embassy	Disbursements	1,074.15
01/21/81	Swiss Embassy	Legal Fees	11,250.00
03/27/81	Swiss Embassy	Disbursements	528.55
<u>Federation Suisse des Associations de Fabricants d'Horlogerie</u>			
01/09/81	Swiss Watch Federation	Legal Fees	6,250.00
01/09/81	Swiss Watch Federation	Disbursements	348.13
04/03/81	Swiss Watch Federation	Legal Fees	6,250.00
04/03/81	Swiss Watch Federation	Disbursements	471.16
<u>Embassy of the Government of Israel</u>			
03/13/81	State of Israel	Legal Fees	22,995.00
03/13/81	State of Israel	Disbursements	3,100.97
<u>London Commodity Exchange Co., Ltd. and International Commodities Clearing House, Ltd.</u>			
02/06/81	London Commodity Exch.	Legal Fees	1,350.00
02/06/81	London Commodity Exch.	Disbursements	271.19
03/13/81	London Commodity Exch.	Legal Fees	770.00
03/13/81	London Commodity Exch.	Disbursements	29.01
04/03/81	London Commodity Exch.	Legal Fees	650.00
04/03/81	London Commodity Exch.	Disbursements	87.85
05/15/81	London Commodity Exch.	Legal Fees	670.00
05/15/81	London Commodity Exch.	Disbursements	65.61

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15. (a) DISBURSEMENTS - MONIESDuring this six-month reporting period, ~~have you~~ ^{INTERNAL SECURITY} ^{REGISTRATION UNIT}

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?

Yes X No

(2) transmitted monies to any such foreign principal?

Yes No X

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
Various	Xerox Corporation	Duplicating	\$ 525.80
Various	C&P Telephone	Telephone	43.92
Various	U.S. Postal Service	Postage	51.60
Various	A&P Employees	Local Transportation	221.15
Various	A&P Employees	Cash Expense	10.00
02/26/81	Document Center	Duplicating	531.40
Various	A&P Employees	Publication	17.45
Total			\$ 1,401.32

Federation Suisse des Associations de Fabricants d'Horlogerie

Various	Xerox Corporation	Duplicating	\$ 1,464.83
Various	A&P Employees	Local Transportation	93.30
Various	A&P Employees	Cash Expense	595.60
Various	U.S. Postal Service	Postage	23.61
Various	RCA Global Communication	Telexes	56.55
04/06/81	B. Landau	Travel Expense	177.50
Total			\$ 2,411.39

London Commodity Exchange Co., Ltd. and International
Commodities Clearing House, Ltd.

Various	Xerox Corporation	Duplicating	\$ 7.20
Various	U.S. Postal Service	Postage	187.56
Various	RCA Global Communication	Telexes	15.73
03/03/81	Madison Nat'l Bank	Bank Transfer Charge	5.00
Total			\$ 215.49

ATTACHMENT NO. 9

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INTERNAL SECURITY
SECTION
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15. (c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this six-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes _____ No X ^{*/}

^{*/} However, the following persons who have filed Short-Form Registration Statements have made political contributions:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Paul S. Berger</u>			
2/14/81	\$500	Gorton Debt-Retirement Committee	Mr. Gorton
<u>Mark L. Perlis</u>			
4/12/81	\$50	Barney Frank for Congress	Barney Frank
<u>William D. Rogers</u>			
3/22/81	\$25	Friends of Chuck Robb	Chuck Robb
<u>Lawrence A. Schneider</u>			
5/2/81	\$10	Hoyer for Congress	S. Hoyer

Embassy of the Government of Israel

The Registrant rendered advice on U.S. laws, regulations, and policies concerning taxation, financing, energy matters, and the U.S./Iran hostage agreements. The Registrant also provided legal representation of the principal in connection with a financing transaction.

Union Nacional de Productores de Hortalizas

The Registrant represented the West Mexico Vegetable Distributors Association in Southwest Florida Winter Vegetable Growers Ass'n v. United States, No. 80-4-00577 (U.S. Court of International Trade). The Registrant also rendered advice on U.S. laws, regulations and policies concerning pesticides.

Manos del Uruguay

The Registrant rendered advice on U.S. laws, regulations and policies and represented the principal in connection with pending petitions filed with the Office of the United States Trade Representative (Case Nos. 79-24, 79-31, 79-32) concerning GSP treatment for certain products.

Government of Nicaragua

The Registrant rendered advice on U.S. laws, regulations and policies and represented the principal at meetings with U.S. government officials concerning extradition proceedings. The Registrant also rendered advice on U.S. laws, regulations and policies concerning arms exports, trusts and estates, and represented the principal in connection with U.S. legal proceedings against Nicaraguan nationals. The Registrant also represented the principal in connection with negotiations over a disputed contract.

Government of Spain

The Registrant rendered advice on U.S. laws, regulations and policies affecting bilateral agreements between the principal and the United States.

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning pending litigation in U.S. courts and agencies, taxation, treaty provisions on taxation,

the U.S./Iran hostage agreements, criminal law, environmental impact statements, immigration, inheritance, adoption, antitrust, imports of ball bearings, electronic products, cheese and watches, international trade, the economy and torts. Further, the Registrant represented the principal in the cases In the Matter of the Petition of Josette Geisser, divorced Bauer and Josette Claire Bauer nee Geisser v. United States.

Federation Suisse des Associations de Fabricants
d'Horlogerie

The Registrant rendered advice on U.S. laws, regulations and policies concerning U.S. trade policy, watch tariffs, economic developments, excise taxes, customs requirements and watch imports and exports.

Dr. Dirk Alan Maxen-McIntire

The Registrant rendered advice on U.S. laws, regulations, legislation and policies concerning Section 349(a)(i) of the Immigration and Nationality Act.

International Telecommunications Satellite
Organization (INTELSAT)

The Registrant rendered advice on U.S. laws, regulations and policies concerning taxation. The Registrant also assisted the foreign principal in its effort to amend Public Law 90-553 (the International Center Act of 1968) to permit the State Department to lease a part of the International Center to the foreign principal for use as its headquarters site.

The de Havilland Aircraft of Canada, Ltd.

The Registrant rendered advice on U.S. laws, regulations and policies and represented the principal in connection with United States procurement of aircraft manufactured by the principal. The Registrant assisted the principal in presenting its aircraft to the U.S. Armed Services. The Registrant also rendered advice on U.S. laws, regulations and policies concerning U.S. exports and munitions control.

International Commodities Clearing House, Ltd.
and The London Commodity Exchange Company, Ltd.

The Registrant rendered advice on C.F.T.C. proposed Rule 21.03 and proposed rules relating to options trading.

Kawasaki Heavy Industries, Ltd.

The Registrant assisted the foreign principal in obtaining a U.S. government license to sell a product manufactured by the foreign principal to a third country.

Table Grape Growers Association

The Registrant rendered advice on proposed legislation relating to table grape imports.

RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION

JUL 8 9 55 AM '81

INTERNAL SECURITY
SECTION
REGISTRATION UNIT

Union Nacional de Productores de Hortalizas

01/09/81	West Mexico Vegetable Distributors	Legal Fees	4,550.00
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Government of Nicaragua

01/16/81	Government of Nicaragua	Legal Fees	27,645.00
01/16/81	Government of Nicaragua	Disbursements	2,540.87
03/27/81	Government of Nicaragua	Legal Fees	17,918.55
03/27/81	Government of Nicaragua	Disbursements	5,453.62
05/08/81	Government of Nicaragua	Legal Fees	23,166.00
05/08/81	Government of Nicaragua	Disbursements	4,963.42

Ets. Beherman Demoen N.V./S.A., Engineering Divison

02/27/81	Beherman	Legal Fees	23,733.91
02/27/81	Beherman	Disbursements	6,266.09

Corporation for Economic Development H.I. Ltd.

12/24/80	Corp. for Econ. Develop.	Legal Fees	18,500.00
01/09/81	Corp. for Econ. Develop.	Legal Fees	24,835.24
01/09/81	Corp. for Econ. Develop.	Disbursements	5,159.76
05 29/81	Corp. for Econ. Develop.	Disbursements	5,000.00

Table Grape Growers Association

04/24/81	Table Grape Growers Assoc.	Legal Fees	\$ 9,450.00
04/24/81	Table Grape Growers Assoc.	Disbursements	2,593.30

Manos del Uruguay

01/09/81	Manos del Uruguay	Legal Fees	1,300.00
01/09/81	Manos del Uruguay	Disbursements	17.66
02/13/81	Manos del Uruguay	Legal Fees	2,200.00
04/03/81	Manos del Uruguay	Legal Fees	2,150.00

INTELSAT

05/15/81	Intelsat	Disbursements	32.10
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TOTAL	\$ 254,887.14
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British American Arts Assoc., U.K.

Various	Xerox Corporation	Duplicating	\$	25.86
Various	A&P Employees	Local Transportation		43.50
Various	A&P Employees	Cash Expense		22.00
		Total	\$	91.36

Ets. Beherman Demoen N.V./S.A., Engineering Division

Various	U.S. Postal Service	Postage	\$	5.10
Various	A&P Employees	Local Transportation		10.00
		Total	\$	15.10

Corporation for Economic Development H.I. Ltd.

Various	Xerox Corporation	Duplicating	\$	80.15
Various	U.S. Postal Service	Postage		1.73
Various	A&P Employees	Local Transportation		56.85
Various	A&P Employees	Cash Expense		53.54
Various	RCA Global Communication	Telexes		55.40
Various	Edmondson & Associates	Professional Services		5,374.69
12/30/80	U.S. Corp. Co.	Duplicating		27.00
01/23/81	D.C. Bar	CLE Course		27.00
01/30/81	Sky Courier	Air Courier		472.75
		Total	\$	6,149.11

Table Grape Growers Association

Various	Xerox Corporation	Duplicating	\$	12.90
Various	A&P Employees	Local Transportation		3.60
05/28/81	RCA Global Communication	Telexes		2.34
		Total	\$	18.84

Government of Spain

Various	Xerox Corporation	Duplicating	\$	124.61
Various	A&P Employees	Local Transportation		85.55
Various	A&P Employees	Cash Expense		69.38
01/09/81	W. Rogers	Books		20.00
12/30/80	American Defense Preparedness	Books		45.00
02/26/81	T.A. Callaghan	Professional Services		900.00
		Total	\$	1,244.54

Manos del Uruguay

Various	Xerox Corporation	Duplicating	\$	6.45
Various	A&P Employees	Local Transportation		11.90
Various	U.S. Postal Service	Postage		7.50
		Total	\$	25.85

INTELSAT

Various	Xerox Corporation	Duplicating	\$	4.50
Various	A&P Employees	Local Transportation		26.70
		Total	\$	31.20

Government of Nicaragua

Various	Xerox Corporation	Duplicating	\$	594.05
Various	C&P Telephone	Telephone		4.80
Various	A&P Employees	Local Transportation		426.10
Various	A&P Employees	Cash Expense		733.89
Various	U.S. Postal Service	Postage		17.60
Various	A&P Employees	Publications		74.36
Various	Madison Nat'l Bank	Bank Transfer Charge		20.00
Various	Columbia Language Service	Professional Service		1,072.40
03/05/81	Western Union	Telegrams		1,038.50
03/31/81	Federal Express	Air Courier		26.00
Various	RCA Global Communications	Telexes		171.02
04/23/81	Archer Courier	Air Courier		17.00
04/28/81	Sprint Packages	Air Courier		40.00
05/28/81	MacKenzie Associates	Outside Secretarial		5.00
03/31/81	J.S. Kreder	Professional Services		13.50
04/27/81	Shamus, Inc.	Professional Services		375.00
05/28/81	Cyberway	Professional Services		5,544.60
01/08/81	N. Tennille	Travel Expense		858.20
Various	P. Reichler	Travel Expense		2,913.48
		Total		\$13,945.50

The de Havilland Aircraft of Canada, Ltd.

Various	Xerox Corporation	Duplicating	\$	397.95
Various	C&P Telephone	Telephone		6.53
Various	A&P Employees	Local Transportation		196.45
Various	U.S. Postal Service	Postage		7.46
Various	A&P Employees	Publications		53.00
Various	A&P Employees	Cash Expense		303.05
05/28/81	MacKenzie Associates	Outside Secretarial		37.50
03/31/81	Wilson-Gill	Rental Equipment		29.28
03/03/81	T.A. Callaghan	Professional Services		1,200.00
03/20/81	T. Wilner	Travel Expense		417.50
		Total		\$ 2,648.72

Kawasaki Heavy Industries, Ltd.

Various	Xerox Corporation	Duplicating	\$	8.60
Various	A&P Employees	Local Transportation		9.50
12/30/80	RCA Global Communications	Telexes		20.07
		Total		38.17

Embassy of the Government of Israel

Various	Xerox Corporation	Duplicating	\$ 341.00
Various	C&P Telephone	Telephone	12.90
Various	A&P Employees	Cash Expense	129.42
Various	A&P Employees	Local Transportation	134.20
04/02/81	Charles E. Simon	Professional Service	54.00
05/28/81	MacKenzie Associates	Outside Secretarial	50.00
05/28/81	A&P Employees	Travel Expense	175.25
05/28/81	RCA Global Communications	Telexes	6.87
04/07/81	W. Debevoise	Travel Expense	1,998.40
04/07/81	H. Adler	Travel Expense	989.00
04/07/81	W. Rogers	Travel Expense	1,199.00
		Total	\$ 5,090.04

Union Nacional de Productores de Hortalizas

Various	Xerox Corporation	Duplicating	\$ 189.45
Various	A&P Employees	Local Transportation	56.40
Various	U.S. Postal Service	Postage	2.42
Various	Florida Clipping Service	Clipping Service	247.44
02/12/81	J.P. Chiofalo	Depositions and	
		Transcripts	359.00
12/16/80	Baumgarten Co.	Supplies	4.19
01/23/81	FOI Services, Inc.	Professional Services	82.32
03/11/81	P. Macrory	Travel Expense	153.00
		Total	\$ 1,094.22

Lawrence Sunderland (Consultant Services to
Foreign Principals and Registrant's Other Clients)

06/02/81	Lawrence Sunderland	Reimbursement Ex-	
		penses April-May	\$ 33.55
06/01/81	Lawrence Sunderland	Professional Services	2,350.00
05/01/81	Lawrence Sunderland	Professional Services	2,350.00
04/08/81	Lawrence Sunderland	Reimbursement Ex-	
		penses Feb.-March	47.48
04/01/81	Lawrence Sunderland	Professional Services	2,350.00
03/02/81	Lawrence Sunderland	Professional Services	2,350.00
02/09/81	Lawrence Sunderland	Reimbursement Ex-	
		penses Dec.-Jan.	25.31
02/03/81	Lawrence Sunderland	Professional Services	2,350.00
01/02/81	Lawrence Sunderland	Professional Services	2,350.00
		Total	\$ 14,206.32

John Jackson (Consultant Services to
Foreign Principals and Registrant's Other Clients)

01/21/81	John Jackson	Professional Services	\$ 1,000.00
02/03/81	John Jackson	Professional Services	1,000.00
02/11/81	John Jackson	Reimbursement Ex-	
		penses -- January	72.42
03/02/81	John Jackson	Professional Services	1,000.00
04/02/81	John Jackson	Professional Services	1,000.00
04/08/81	John Jackson	Telephone	14.23
04/08/81	John Jackson	Travel Expense	451.14
05/05/81	John Jackson	Reimbursement Ex-	
		penses -- April	296.80
05/01/81	John Jackson	Professional Services	\$ 1,000.00
		Total	\$ 5,834.59

TOTAL \$ 54,461.76